

1 Jun Dam (*Pro Se*)
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The Honorable Frederick P. Corbit
Chapter 11

6 **UNITED STATES BANKRUPTCY COURT**
7 **EASTERN DISTRICT OF WASHINGTON**

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10 In re:

11 GIGA WATT INC.,

12 Debtor
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Case No. 18-03197-FPC

**NOTICE AND MOTION TO LIMIT
NOTICE OF REQUEST FOR
RECONSIDERATION OF ORDER
APPROVING SALE OF TNT
FACILITY AND TRAILER
EQUIPMENT FREE AND CLEAR OF
LIENS**

18 **NOTICE**

19 **PLEASE TAKE NOTICE** that creditor Jun Dam, in propria persona, has moved for an order
20 limiting notice for a motion granting a request for reconsideration of the Order Approving Sale of
21 TNT Facility and Trailer Equipment Free and Clear of Liens. The Motion requests an order
22 authorizing Jun Dam to serve the request for reconsideration of Order Approving Sale of TNT
23 Facility and Trailer Equipment Free and Clear of Liens on the Trustee, United States Trustee, the
24 Official Unsecured Creditors' Committee, the Creditors' Committee of WTT Token Holders and
25 Miners, those requesting special notice, ECF participants, and the top 20 largest creditors as
26 designated in the schedules filed by the Debtor. **IF YOU OPPOSE** the Motion you

1 must file your written response with the court clerk, and request a hearing at P.O. Box 2164, W.
2 904 Riverside, Room 321, Spokane, WA 99210 on or before the response date, which is June
3 30th, 2020. **YOU MUST ALSO** serve a copy of any objection on the undersigned at 237 Kearny
4 St. #9096, SF, CA 94108; on the Chapter 11 Trustee; and on the Office of the United States
5 Trustee. **IF NO RESPONSE IS TIMELY FILED AND SERVED**, the Court may, in its
6 discretion, **GRANT THE MOTION WITHOUT A HEARING AND WITHOUT FURTHER**
7 **NOTICE.**

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9 **MOTION**

10 **COMES NOW** creditor Jun Dam, in propria persona, moves to request an order limiting notice
11 for his motion granting a request for reconsideration of the Order Approving Sale of TNT Facility
12 And Trailer Equipment Free and Clear of Liens.

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14 **ARGUMENT**

15 Pursuant to Rules 2002(m), and 9007 of the Federal Rules of Bankruptcy Procedure, the Court
16 may designate the required notice for the motion to request reconsideration of the Order
17 Approving Sale of TNT Facility And Trailer Equipment Free and Clear of Liens. Such notice
18 should be limited to the Trustee, United States Trustee, the Official Unsecured Creditors'
19 Committee, the Creditors' Committee of WTT Token Holder and Miners, those requesting
20 special notice, ECF participants, and the top 20 largest creditors as designated in the schedules
21 filed by the Debtor (the "Service Parties."). Given that a substantial number of the roughly 354
22 creditors in this case are represented by counsel for the Creditors' Committee of WTT Token
23 Holder and Miners, that both the Trustee and Official Committee of Unsecured Creditors are
24 represented by counsel, and that the remaining Service Parties are the most substantial and active
25 creditors, the Court should limit notice in this matter to the Service Parties to avoid unnecessary
26 cost, burden, and delay.

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4 **CONCLUSION**

5 **WHEREFORE**, The Court should enter an order authorizing Jun Dam to serve the motion to
6 request reconsideration of the Order Approving Sale of TNT Facility And Trailer Equipment Free
7 and Clear of Liens on the Service Parties only and for such other and further relief as may be just
8 and proper.
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10 Dated this 1st day of June, 2020
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12
13 /s/ Jun Dam

14 Jun Dam (*Pro Se*)

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